

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GLUCAGON-LIKE PEPTIDE-1
RECEPTOR AGONISTS (GLP-1 RAS)
PRODUCTS LIABILITY LITIGATION,**

**THIS DOCUMENT RELATES TO:
*ALL ACTIONS/ALL CASES***

CIVIL ACTION

MDL No. 3094

2:24-md-03094

HON. KAREN S. MARSTON

JOINT MOTION FOR THE ENTRY OF PRIVILEGE LOGGING ORDER

All Defendants and Plaintiffs (together, the “Parties”), respectfully, and by counsel, hereby jointly move for the entry of the attached Proposed Privilege Logging Order (the “Proposed Order”) governing (1) the timing, contents, and form of privilege logs, (2) exclusions from privilege logs, and (3) procedures for challenging privilege logs.

The Parties believe it is in the interest of all Parties to memorialize their respective obligations regarding privilege logs as set forth in the Proposed Order. Accordingly, the Parties jointly request that the Court grant their Joint Motion and enter the attached Proposed Order.

Dated: June 14, 2024

Respectfully submitted,

/s/ Loren H. Brown

Loren H. Brown (admitted *pro hac vice*)

Lucas P. Przymusinski (admitted *pro hac vice*)

DLA PIPER LLP (US)

1251 Avenue of the Americas

27th Floor

New York, NY 10020-1104

Telephone: (212) 335-4846

Facsimile: (212) 335-4501

loren.brown@us.dlapiper.com

lucas.przymusinski@us.dlapiper.com

Ilana H. Eisenstein (PA Bar No. 94907)
Raymond M. Williams (PA Bar No. 90771)
DLA PIPER LLP (US)
1650 Market Street, Suite 5000
Philadelphia, PA 19103
Telephone: (215) 656-3300
Facsimile: (215) 606-3301
ilana.eisenstein@us.dlapiper.com
raymond.williams@us.dlapiper.com

Matthew A. Holian (admitted *pro hac vice*)
Katherine W. Insogna (admitted *pro hac vice*)
DLA PIPER LLP (US)
33 Arch Street, 26th Floor Boston, MA 02110
Telephone: (617) 406-6000
Facsimile: (617) 406-6100
matt.holian@us.dlapiper.com
katie.insogna@us.dlapiper.com

*Attorneys for Defendants Novo Nordisk A/S,
Novo Nordisk North America Operations A/S,
Novo Nordisk US Holdings Inc., Novo Nordisk
US Commercial Holdings Inc., Novo Nordisk
Inc., Novo Nordisk Research Center Seattle, Inc.,
and Novo Nordisk Pharmaceutical Industries LP*

Dated: June 14, 2024

/s/ Samuel W. Silver
Samuel W. Silver (PA Bar No. 56596)
Catherine M. Recker (PA Bar No. 56813)
Bruce P. Merenstein (PA Bar No. 82609)
Abigail T. Burton (PA Bar No. 334450)
WELSH & RECKER, P.C.
306 Walnut Street
Philadelphia, PA 19106
(215) 972-6430
ssilver@welshrecker.com
cmrecker@welshrecker.com
bmerenstein@welshrecker.com
aburton@welshrecker.com

James F. Hurst, P.C. (admitted *pro hac vice*)
Renee D. Smith (admitted *pro hac vice*)
Diana M. Watral, P.C. (admitted *pro hac vice*)
Mark Premo-Hopkins (admitted *pro hac vice*)
KIRKLAND & ELLIS

300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
james.hurst@kirkland.com
renee.smith@kirkland.com
diana.watral@kirkland.com
mark.premohopkins@kirkland.com

Jonathan M. Redgrave (admitted *pro hac vice*)
Erica B. Zolner (admitted *pro hac vice*)

REDGRAVE LLP

4800 Westfields Blvd. | Suite 250
Chantilly, VA 20151
(703) 592-1155
jredgrave@redgravellp.com
ezolner@redgravellp.com

Attorneys for Defendant Eli Lilly & Company

Dated: June 14, 2024

/s/ Parvin K. Aminolroaya
Parkin K. Aminolroaya
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
paminolroaya@seegerweiss.com

/s/ Jonathan Orent
Jonathan Orent
MOTLEY RICE LLC
40 Westminister Street, 5th Floor
Providence, RI 02903
Telephone: (401) 457-7700
jorent@motleyrice.com

/s/ Sarah Ruane
Sarah Ruane
WAGSTAFF & CARTMELL
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: (813) 701-1123
sruane@wcllp.com

/s/ Paul Pennock

Paul Pennock

MORGAN & MORGAN

199 Water Street, Suite 1500

New York, NY 10038

Telephone: (212) 738-6299

ppennock@forthepeople.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on June 14, 2024, a true and correct copy of the foregoing Joint Motion for the Entry of Privilege Logging Order was electronically filed with the Clerk of the Court using the CM/ECF system, causing a notification of the filing to all counsel of record.

/s/ Loren H. Brown

Loren H. Brown